



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*The Jacob K. Javits Federal Building  
26 Federal Plaza, 37th Floor  
New York, New York 10278*

July 16, 2024

**BY ECF AND EMAIL**

The Honorable Richard J. Sullivan  
United States Circuit Judge  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, New York 10007

**Re: *United States v. Cyrus Little*, 17 Cr. 183 (RJS)**

Dear Judge Sullivan:

The Government submits this letter to respectfully request that chronologies and other records maintained by the United States Probation Office (“Probation”) relating to the terms of the defendant’s supervision and the violations thereof, be unsealed by the Court so that Probation may provide them to the parties ahead of the July 30, 2024 violation of supervised release (“VOSR”) revocation hearing currently scheduled in the above-captioned case. The pending VOSR matter involves, among other specifications, a specification arising out of certain drug tests administered in connection with the defendant’s supervised release (Specification 1); and a specification arising out of statements and omissions allegedly made by the defendant to his assigned Probation Officer on or about May 24, 2024 (Specification 5). The Government will likely call one or more Probation Officers to testify at the upcoming hearing regarding these specifications, and it is possible that certain records maintained by Probation will be introduced as evidence at the hearing.

The above-described chronologies and records contain material relevant to the hearing, and the Government understands that they may be unsealed only upon a Court order. In addition, once in possession of the files, the Government will disclose them to the defendant pursuant to Title 18, United States Code, Section 3500 and/or pursuant to its obligations under *Brady v. Maryland*, 373

U.S. 83 (1963) and *Giglio v. United States*, 405 U.S. 150 (1972). Accordingly, the Government respectfully requests that the above-described chronologies and records be ordered unsealed.

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

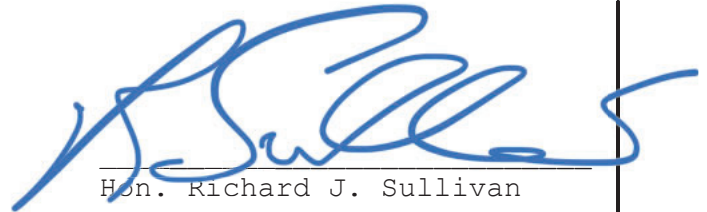
by: /s/  
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cc: James Bell, Esq. (by ECF and email)  
Probation Officer Ji'vonne Gilmore (by email)

IT IS HEREBY ORDERED THAT the United States Probation Office shall provide the parties with the chronologies and other records it maintains relating to the terms of Mr. Little's supervision and the violations thereof. The Clerk of Court is respectfully directed to terminate the motion pending at Doc. No. 54.

SO ORDERED.

Dated: July 17, 2024  
New York, New York



Hon. Richard J. Sullivan  
United States Circuit Judge  
Sitting by Designation